

DEC 10 2019

BOISE, IDAHO

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Attorneys for Intervenor/Respondents,
Payette Lakes Cottage Sites Owners Association, Inc.
and Wagon Wheel Bay Dock Association, Inc.

BEFORE THE STATE BOARD OF LAND COMMISSIONERS

SHARLIE-GROUSE)	
NEIGHBORHOOD ASSOCIATION,)	OBJECTION TO SGNA'S
INC.,)	PETITION FOR
)	RECONSIDERATION
Petitioners,)	
)	(Intervenor-Respondents, Payette
vs.)	Lakes Cottage Sites Owners
)	Association, Inc. and Wagon Wheel
IDAHO STATE BOARD OF LAND)	Bay Dock Association, Inc.)
COMMISSIONERS,)	
)	
Respondent,)	
)	
and)	
)	
PAYETTE LAKES COTTAGE SITES)	
OWNERS ASSOCIATION, INC., an)	
Idaho non-profit corporation, and)	
WAGON WHEEL BAY DOCK)	
ASSOCIATION, INC., an Idaho non-)	
profit corporation,)	
)	
Intervenor/Respondents.)	
)	

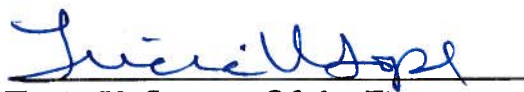
COME NOW Intervenor/Respondents Payette Lakes Cottage Sites Owners Association, Inc. ("PLCSOA") and Wagon Wheel Bay Dock Association, Inc. ("WWBDA"), by and through their attorneys, Mark D. Perison, P.A., and hereby object to the Petition for Reconsideration filed by Sharlie-Grouse Neighborhood Association, Inc. ("SGNA").

OBJECTION

In its Petition for Reconsideration, SGNA has not identified any new argument that has not already been extensively briefed during the three motions for summary judgment, responses and replies thereto, and considered by the Hearing Officer. Further, SGNA has not offered any argument that provides a basis to reconsider the Hearing Officer's well-reasoned decision that there is no jurisdictional basis for the Land Board to essentially un-do an agency action undertaken over six years ago, under the guise of a retrospective declaratory review action. Because no new argument has been offered, and no legal basis exists for the remedy requested, SGNA's Petition for Reconsideration should be denied.

MARK D. PERISON, P.A.

DATED: December 10, 2019.

By: 
Tricia K. Soper – Of the Firm
Attorneys for Intervenor/Respondents,
Payette Lakes Cottage Sites Owners
Association, Inc. and Wagon Wheel
Bay Dock Association, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of December, 2019, I caused to be served a true and correct copy of the foregoing, by the method indicated, and addressed to the following:

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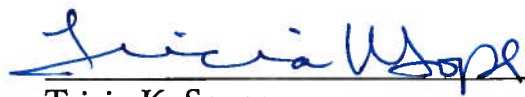
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